

Exhibit 52

Judy Wu Deposition Excerpts

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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

TESLA, INC., a Delaware
corporation,

Plaintiff,

v.

MARTIN TRIPP, an
individual,

Defendant.

MARTIN TRIPP, an
individual,

Counterclaimant,

v.

TESLA, INC., a Delaware
corporation,

Counterdefendant,

Case No.
3:18-CV-00296-LRH-CBC

HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY

Videotaped Deposition of Judy Wu

Fremont, California

Monday, September 9, 2019

Michael P. Hensley, RDR, CSR No. 14114

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1 [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]
2 [REDACTED] [REDACTED]
3 [REDACTED] [REDACTED] [REDACTED]
4 [REDACTED] [REDACTED]
5 [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]
6 [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]
7 [REDACTED] [REDACTED] [REDACTED]
8 [REDACTED] [REDACTED]
9 [REDACTED] [REDACTED]
10 [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]
11 [REDACTED] [REDACTED] [REDACTED] [REDACTED]
12 [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]
13 [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]
14 [REDACTED] [REDACTED]
15 [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]
16 [REDACTED] [REDACTED] [REDACTED]
17 [REDACTED] [REDACTED]
18 [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]
19 [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]
20 [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]
21 [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]
22 [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]
23 [REDACTED] [REDACTED] [REDACTED] [REDACTED]

24 Q. Okay. So you could, for example, put in a
25 component, and it would tell you all of the --

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1 A. Yes.

2 Q. -- the other components?

3 A. All the components go into that battery.

4 [REDACTED]

5 [REDACTED]

6 [REDACTED]

7 [REDACTED]

8 [REDACTED]

9 [REDACTED]

10 [REDACTED]

11 [REDACTED]

12 [REDACTED]

13 [REDACTED]

14 [REDACTED]

15 [REDACTED]

16 [REDACTED]

17 [REDACTED]

18 [REDACTED]

19 [REDACTED]

20 [REDACTED]

21 [REDACTED]

22 [REDACTED]

23 [REDACTED]

24 [REDACTED]

25 [REDACTED]

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1 THE REPORTER: Thank you.

2 BY MR. CARPENTER:

3 Q. And have you worked at other companies, other
4 manufacturing companies?

5 A. Yes.

6 Q. Can you talk a little bit about your job
7 background?

8 A. So prior to Tesla, I work for Hitachi, the
9 software --

10 Q. Yes.

11 A. Right. The storage, the semiconductor
12 equipment. And prior to that, I have worked for
13 PerkinElmer. It's also a manufacturing environment. So
14 I have been manufacturing environment inventory
15 industrial end of the field for probably 20 years.

16 Q. Wow, okay. And at -- at other companies you
17 worked with, did they use a similar system?

18 A. Not really, because MOS is designed by Tesla.

19 Q. Okay.

20 A. It's a customer built. Work very uniquely for
21 Tesla.

22 Q. Okay. But other manufacturers, did they also
23 track the parts?

24 A. Yes.

25 Q. Okay.

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1 where, how this material cost from. Because the MOS is
2 not supposed to give you dollars.

3 (Mr. Masia exited the room.)

4 BY MR. GATES:

5 Q. Okay. Where do you get the dollar value?

6 A. Dollar is from our Warp Drive system, which
7 finance people use Warp Drive system as the dollars.
8 MOS only provides quantities.

9 Q. Do you know whether or not process technicians
10 at the Gigafactory are given access to the financial
11 data in the Warp system?

12 A. It's not -- they are not supposed to have any
13 access to Warp Drive data.

14 Q. Okay. So you don't know -- you can't tell from
15 this data whether or not that material cost is correct?

16 A. I could not tell from here.

17 Q. Okay. Putting aside whether or not the material
18 cost is correct, just assume for purposes of my question
19 that it is. If you use this quantity of scrap and
20 multiplied it by the material cost, would the total
21 material cost overstate the actual -- the value of the
22 actual physical scrap?

23 A. So this talk about the \$21 million material
24 cost.

25 Q. Yeah.

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1 STATE OF CALIFORNIA)
) ss.
1 COUNTY OF ALAMEDA)

3 I, Michael Hensley, Certified Shorthand Reporter,
4 Registered Diplomat Reporter, in and for the State of
5 California, Certificate No. 14114,
6 do hereby certify:

7 That the witness in the foregoing deposition was by
8 me first duly sworn to testify to the truth, the whole
9 truth, and nothing but the truth in the foregoing cause;
10 that said deposition was taken before me at the time and
11 place herein named; that said deposition was reported by
12 me in shorthand and transcribed, through computer-aided
13 transcription, under my direction; and that the
14 foregoing transcript is a true record of the testimony
15 elicited and proceedings had at said deposition.

16 I do further certify that I am a disinterested
17 person and am in no way interested in the outcome of
18 this action or connected with or related to any of the
19 parties in this action or to their respective counsel.

20 In witness whereof, I have hereunto set my hand
21 this 26th day of September, 2019.

22

23

Michael Hensley, CSR NO. 14114

24

25